

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MARIO LACY,	)	
Plaintiff,	)	C.A No. 04-11492-REK
	)	
v.	)	
	)	
WILLIAM J. FEENEY, KENNETH	)	
HEARNS, JUAN J. SEOANE,	)	
and the CITY OF BOSTON,	)	
Defendants.	)	
	)	

**PLAINTIFF'S MOTION FOR LEAVE OF COURT  
TO FILE MOTION FOR SUMMARY JUDGMENT LATE**

Now comes the plaintiff to respectfully request that this Honorable Court allow him leave to file late his motion for summary judgment and supporting materials, which leave of Court was inadvertently overlooked when the pleadings were filed. These pleadings were filed on February 23, 2006, apparently 23 days late. Trial is presently scheduled for April 17, 2006. Counsel for the plaintiff apologizes for the inadvertence and has no objection to the defendants being afforded additional time to respond to the motion for summary judgment should this Court allow the leave to file late.

Respectfully submitted,  
MARIO LACY,  
By his attorneys,

//s// Jessica D. Hedges  
Stephen B. Hrones (BBO No. 242860)  
Jessica D. Hedges (BBO No. 645847)  
Michael Tumposky (BBO No. 660618)  
HRONES GARRITY & HEDGES LLP  
Lewis Wharf-Bay 232, Boston, MA 02110  
(617) 227-4019

**CERTIFICATE OF SERVICE**

I, Jessica D. Hedges, hereby certify that on this 13th day of March, 2006, I served a true and correct copy of the foregoing PLAINTIFF'S MOTION FOR LEAVE OF COURT TO FILE MOTION FOR SUMMARY JUDGMENT LATE, where unable to do so electronically, by United States First-Class Mail, postage prepaid, to all counsel of record in this matter.

//s// Jessica D. Hedges  
Jessica D. Hedges